

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

VALLEY HEALTH SYSTEM, LLC, a Delaware
Limited Liability company, DVH HOSPITAL
ALLIANCE, LLC, a Delaware Limited Liability
company, and SUMMERLIN HOSPITAL
MEDICAL CENTER, LLC, a Delaware Limited
Liability company,

Plaintiffs,

vs.

TRAVEL INSURANCE FACILITIES, PLC, a
Foreign Corporation, UNION
REISEVERSICHERUNG
AKTIENGESELLSCHAFT, a Foreign
Corporation,

Defendants.

CASE NO.: 2:22-CV-00365-ART-DJA

ORDER APPROVING

**STIPULATION AND ORDER TO
EXTEND TIME FOR PLAINTIFFS'
TO FILE REPLY TO DEFENDANTS'
RESPONSE TO PLAINTIFFS'
MOTION FOR ENLARGEMENT OF
TIME TO FILE RESPONSES TO
URV MOTION TO DISMISS [ECF
NO. 24] AND TIF MOTION TO
DISMISS [ECF NO. 56] AND
DEFENDANTS' RESPONSE TO
PLAINTIFFS' RENEWED MOTION
FOR LEAVE TO CONDUCT
LIMITED JURISDICTIONAL
DISCOVERY [ECF NO. 62].**

[FIRST REQUEST]

IT IS HEREBY STIPULATED AND AGREED by and between Plaintiffs, VALLEY HEALTH SYSTEM, LLC; DVH HOSPITAL ALLIANCE, LLC, and SUMMERLIN HOSPITAL MEDICAL CENTER, LLC (collectively, “Plaintiffs”) by and through their counsel of record, Timothy M. Hartley, Esq. (admitted *pro hac vice*) of the Hartley Law Offices and Jason M. Wiley, Esq. of the law firm Wiley Petersen and Defendants, UNION REISERVERSICHERUNG AKTIENGESELLSCHAFT (“URV”) and TRAVEL INSURANCE FACILITIES, PLC (“TIF”) by and through their counsel of record, Pat Lundvall, Esq. and Daniel Aquino, Esq. of the law firm McDonald Carano to extend the time for Plaintiffs to file a *Reply to Defendants, Union Reiseversicherung Aktiengesellschaft’s and Travel Insurance Facilities, PLC’s Response to Plaintiff’s Motion for Enlargement of Time to File Responses to URV Motion to Dismiss and TIF’s Motion to Dismiss [ECF No. 63] and Defendants’ Response to Plaintiffs’ Renewed Motion for Leave to Conduct Limited Jurisdictional Discovery [ECF No. 62]*. The foregoing Responses were filed on June 22, 2023 with a deadline for the Plaintiffs to file Replies of June 29, 2023, and no hearing date has been scheduled. The parties respectfully request the Court enter an order extending Plaintiffs’ deadline for the Plaintiffs to file Replies to the foregoing Responses to July 6, 2023.

The parties offer the following reasons for the requested extension:

1. Due to the press of business and scheduling conflicts, as well as briefing deadlines in other matters, counsel for the Plaintiffs requested and counsel for the Defendants graciously agreed to a brief extension of time for the Plaintiffs to file their Replies to the foregoing Responses.
2. The requested extension will not unduly prejudice any party to the litigation.
3. The stipulation is made in good faith, not for purposes of delay, and will not cause undue harassment or delay to any party.

1 DATED this 29th day of June, 2023

DATED this 29th day of June, 2023

2 **MCDONALD CARANO**

WILEY PETERSEN

3
4 /s/ Daniel Aquino

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18 *Attorneys for Plaintiffs*

19 **IT IS SO ORDERED.**

20 DATED: June 30, 2023.

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23 **Anne R. Traum**
24 **United States District Court Judge**
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